

**UNITED STATE BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re: Veronica Deshay,	)	
	)	Chapter 13
(Debtor)	)	
	)	18-42077
Chapter 13 Trustee	)	
(Movant)	)	

**DEBTOR'S RESPONSE TO THE TRUSTEE'S MOTION TO DISMISS**

COMES NOW, Douglas M. Heagler, attorney for Debtors, and in response to the Trustee's Motion to Dismiss states the following:

1. Debtor admits the allegations stated in paragraph 1.
2. Debtor is working on submitting the missing returns and addressing the feasibility issues in her case.

WHEREFORE, Debtor prays this Court will enter an order denying the Trustee's Motion to Dismiss or set the matter for a hearing.

Respectfully Submitted,

/s/ Douglas M. Heagler  
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901 Boones Lick, Ste. 100  
St. Charles, MO 63301  
636 278 2778  
[dheagler@freshstartbk.com](mailto:dheagler@freshstartbk.com)

### **CERTIFICATE OF SERVICE**

I certify that a copy of the attached pleading was sent by electronic service on or before March 14, 2023 , to the following parties:

Diana Daugherty  
P.O. Box 430908  
St. Louis, MO 63101

Office of the United States Trustee  
111 S. 10<sup>th</sup> Street, Ste. 6353  
St. Louis, MO 63143

/s/ Douglas M. Heagler  
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